

Regen response to Welsh Government consultation on promoting a resilient and high performing planning service

Context and recommendations: the need to support renewable energy planning in Wales

At Regen we welcome the Welsh government's commitment to addressing the challenges facing the planning system in Wales. Our response to this consultation is focused on ensuring that these reforms help to improve the planning system for renewable energy generation and energy storage projects.

Since the 2024 election, the UK government has committed to achieving a clean power system by 2030. The Welsh government also has a target to generate the equivalent of 100% of their annual electricity consumption from renewable sources by 2035 – in 2022 this figure stood at 59%¹. To meet these ambitious targets, renewable generation, transmission infrastructure and energy storage projects will need to be delivered at scale and speed – the planning system will be a key part in making this happen.

The volume of planning applications for clean energy projects is increasing and is likely to rise as the Clean Power 2030 plan identifies opportunities for investment in renewable projects. The ability of the Welsh planning system to effectively process clean energy projects at scale is thus becoming increasingly important. Local planning authorities play a key role in this process through both the plan-making process (such as developing Renewable Energy Assessments and local policies on renewables), and in the decision-making process (such as assessing small-scale projects and providing local impact assessments for large-scale projects).

Analysis of the UK government Renewable Energy Planning Database (REPD) shows local authorities across Wales received 204 renewable energy planning applications in the last 5 years. The time taken from the submission of the planning application to the decision being made varied by technology: for onshore wind it was on average 10 months, for solar photovoltaic panels and battery sites it was on average 4 months.

This time is significantly longer for applications made through the National Significant Infrastructure Projects process – of which there were 49 total listed in the REPD. The average time for Welsh onshore wind projects which went through this consenting process between 2019 and 2024 was 15 months for onshore wind, 15 months for solar photovoltaics and 17 months for battery projects. This is of concern as over 90% of solar and onshore wind projects

¹ Energy Generation in Wales 2022, Welsh Government

submitted in Wales in this timeframe were consented through the NSIP process. It also reflects the need to address the shortage of planners and planning delays occurring at all levels.

Planning and Environment Decisions Wales (PEDW), local authorities and statutory consultees (including Natural Resources Wales) are currently under-resourced. This affects project programmes, leading to delays in development. This lack of resource also means renewable energy developers may not receive valuable input into their projects at the development stage, missing the opportunity for a better outcome for the people of Wales.

Our response to this consultation is focused on the policies which support the development of renewable energy generation and energy storage projects. From our response we have three key recommendations:

- **Recommendation 1:** training on planning for renewable energy and the wider energy system should be provided for all local authority planners as well as planners working at other decision-making levels.
- **Recommendation 2:** we support the introduction of bursary and apprenticeship schemes and recommend that a dedicated renewable energy planner option is included.
- **Recommendation 3:** a renewable energy planning skills hub should be created, to give planners access to specialist knowledge and help progress renewable energy projects.

About Regen

Regen provides independent, evidence-led insight and advice in support of our mission to transform the UK's energy system for a net zero future. We focus on analysing the systemic challenges of decarbonising power, heat and transport. We know that a transformation of this scale will require engaging the whole of society in a just transformation.

Regen is also a membership organisation with over 200 members who share our mission, including clean energy developers, businesses, local authorities, community energy groups and research organisations across the energy sector. We manage the Electricity Storage Network (ESN) – the industry group and voice of the grid-scale electricity storage industry in GB.

Skills and expertise

There is a significant skills and expertise gap among local authority planners, as well as planners operating at the national level, in relation to renewable energy. This skills gap has tangible impacts on service delivery. For example, developers have raised challenges due to not receiving the necessary local-level feedback on project proposals. This has been considered to delay project delivery timelines or potentially increase the chances of local opposition due to a lack of detailed local planning knowledge being inputted.

The energy system is evolving rapidly, with new technologies emerging. Local authorities often lack the resources and expertise to effectively plan for and respond to these developments. There is a clear need for more planners who possess a comprehensive understanding of the energy system as a whole. We have spoken to local authority planners who, due to their high workloads, are using personal time to upskill in the renewable energy sector. This is neither sustainable nor fair.

Across Wales, local authorities are grappling with resourcing challenges. Planners with renewable energy expertise are often drawn to roles in the energy network or development sectors, exacerbating this gap. This is leaving local authorities increasingly ill-equipped to both assess smaller-scale, low-carbon applications at the local level, as well as to input fully into providing local impact assessments for Nationally Significant Infrastructure Project (NSIP) decisions. Additionally, when updating Local Development Plans, authorities are required to produce Renewable Energy Assessments. This process demands an understanding of the energy system. Without the necessary skills and resources, local authorities struggle in all these elements of energy planning.

To address these challenges, targeted investment in training and upskilling for local authority planners, as well as planners working in other levels of the planning system, is urgently needed, along with increased funding to ensure sufficient capacity within planning teams. Such measures would enable local authorities to provide the informed and timely guidance necessary to support renewable energy development and meet the demands of a rapidly changing energy landscape.

Recommendation: all local authority planners as well as those working at other decision-making levels, should be provided suitable training in the planning system for renewable projects, as well as the wider energy system. This should be available for existing planners as well as new planners and should be updated annually.

Bursary and apprenticeship schemes

We strongly support the introduction of bursary and apprenticeship schemes as a means of addressing critical skills shortages and encouraging recruitment into the planning sector. Such schemes can serve as valuable pathways into the profession for diverse groups, including young people entering the workforce and mid-career professionals seeking a career change. By building capacity within the sector, such initiatives offer a practical and sustainable solution while fostering a more inclusive and resilient workforce.

To maximise impact, we recommend that apprenticeship and bursary programs include a direct focus on roles within Corporate Joint Committee (CJC) specialist planning functions, particularly in areas of high strategic importance such as renewable energy planning.

Establishing dedicated renewable energy planner roles within CJsCs could significantly enhance local and regional planning capabilities, ensuring that decision-making is aligned with emerging technologies and decarbonisation goals, as well as with emerging energy plans such as Local Area Energy Plans. Local planning authorities would also benefit from additional staffing resources to bolster core planning services. Apprenticeships targeting these roles could help address the ongoing resource challenges.

To ensure long-term success, however, it is crucial to also implement measures that secure the retention of skilled professionals beyond their initial training. Proposals should include competitive salaries, comprehensive benefits, and clear structures for personal and professional development of local authority planners. Financial incentives are also likely to be needed to retain existing staff and attract experienced planners and specialists back into the public sector from private sector, including roles within Planning and Environment Decisions Wales (PEDW) as well as in Local Planning Authorities.

Recommendation: We support the introduction of bursary and apprenticeship schemes and recommend that a dedicated renewable energy planner option is included. However, this should come alongside measures to ensure the retention of planners within the public sector.

Shared service delivery and planning skills hubs

Regen supports the proposal to expand shared-service delivery models, recognising their potential to alleviate the resourcing constraints faced by many local authorities. These models, as noted in the consultation, could be particularly beneficial for smaller LPAs, enabling them to pool resources and expertise more effectively.

We strongly advocate for the inclusion of renewable energy specialist planners within these models. Given the growing trend among graduates toward 'green' careers, these roles could be highly attractive and help address some of the recruitment challenges faced by local

authorities. Such specialists would provide much-needed expertise in navigating the complexities and changing nature of renewable energy planning.

We also support the establishment of planning skills hubs, which we believe could play a vital role in addressing the unique challenges of the renewable energy sector. The pace and scale of change in this sector, such as the recent surge in battery storage projects and the anticipated wave of repowering applications for older wind farms, require planners with up-to-date skills and knowledge. In this context a centralised hub for renewable energy expertise could prove highly valuable to both providing advice and resources.

Speaking with local planning authorities has highlighted a widespread lack of training in energy systems and limited understanding of renewable energy technologies. This knowledge gap often hampers planners' ability to evaluate applications effectively and engage constructively with developers. A well-designed planning skills hub could bridge this gap by providing local authorities with:

- Access to the latest knowledge on renewable energy technologies
- Skilled staff available on short notice to support with responding to renewable energy projects
- Targeted training to upskill planners and enhance sector-wide expertise.

Finally, we support the proposal to allocate a proportion of planning fees to fund planning skills hubs. Ensuring the inclusion of renewable energy specialists within these hubs would maximise their value to LPAs and significantly contribute to the transition to a zero-carbon electricity system.

Recommendation: We support the expansion of shared-service delivery models to help with the resourcing constraints planners face. We recommend that renewable energy specialist planners be included in this. We also support the creation of a renewable energy focussed planning skills hub, to give planners access to specialist knowledge, and help progress renewable energy projects quickly.